

1 ANTHONY L. MARTIN, ESQ.  
2 Nevada Bar No. 8177  
3 [anthony.martin@ogletreedeakins.com](mailto:anthony.martin@ogletreedeakins.com)  
4 JILL GARCIA, ESQ.  
5 Nevada Bar No. 7805  
6 [jill.garcia@ogletreedeakins.com](mailto:jill.garcia@ogletreedeakins.com)  
7 BRIAN L. BRADFORD, ESQ.  
8 Nevada Bar No. 9518  
9 [brian.bradford@ogletreedeakins.com](mailto:brian.bradford@ogletreedeakins.com)  
10 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
11 Wells Fargo Tower  
12 Suite 1500  
13 3800 Howard Hughes Parkway  
14 Las Vegas, NV 89169  
15 Telephone: 702.369.6800  
16 Fax: 702.369.6888

17 *Attorneys for Defendants Eldorado Resorts Corporation  
18 and Michael Marrs*

19 **UNITED STATES DISTRICT COURT**  
20 **FOR THE DISTRICT OF NEVADA**

21 MOHAMMED ALI SEKKAT,

22 Plaintiff,

23 vs.

24 ELDORADO RESORTS CORPORATION, a  
25 Florida corporation; MICHAEL MARRS;  
26 BRUCE POLANSKY; KRISTEN BECK;  
27 DOMINIC TALEGHANI; JAMES GRIMES;  
28 AND DOES 1-50, inclusive;

Defendants.

Case No.: 2:15-cv-01029-RFB-PAL

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE DISPOSITIVE  
MOTIONS AND RESPONSES AND  
REPLIES THERETO**

**(FIRST REQUEST)**

22 Pursuant to LR IA 6-1, LR IA 6-2, LR 7-1 and LR 26-4, Plaintiff Mohammed Ali Sekkat  
23 (“Plaintiff”) and Defendants Eldorado Resorts Corporation and Michael Marrs (collectively,  
24 “Defendants”), by and through their undersigned counsel, hereby stipulate and agree to this first  
25 request for extension of time for the parties to file dispositive motions in this action, along with  
26 related responses and replies. Pursuant to the Court’s September 22, 2016, Order for Extension of  
27

1 Discovery Deadlines (ECF No. 46), the current deadline for filing dispositive motions in this case  
2 is January 30, 2017, (*see id.* at 8). The parties have completed all discovery in this matter, and  
3 good cause exists for the proposed extension based upon the following:

4 As the Court is aware, this case is one of thirty-three related lawsuits sitting before this  
5 Court. Recognizing the complexity of litigating these lawsuits simultaneously, the parties agreed  
6 to divide the cases into five groups and stagger deadlines in order to streamline the litigation  
7 process and avoid overlapping dispositive motion deadlines. Defendants' filed Motions for  
8 Summary Judgment on September 1, 2016 and September 15, 2016, in Group II cases.  
9 Unfortunately, response and reply briefing has been delayed and will not be completed before the  
10 deadline for filing dispositive motions in this case.<sup>1</sup>  
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12 Based upon the foregoing, the parties have agreed that the dispositive motion deadlines should  
13 be extended by forty-five (45) days in the following manner:

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- 15 • Defendants shall file their dispositive motions no later than **March 16, 2017**;
- 16 • Plaintiff shall file any response to Defendants' dispositive motions no later than  
17 **April 17, 2017 (30<sup>th</sup> day is Saturday, April 15, 2017)**;
- 18 • Defendants shall file their reply no later than **May 17, 2017**.

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28 <sup>1</sup> This request for additional time is also addressed in Defendants' Limited Response to Plaintiff's Motion for an Extension of Time.

1 This stipulation is not brought for purposes of delay or any other improper purpose.  
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3 Dated this 20th day of December, 2016.  
4

5 WATKINS & LETOFSKY, LLP  
6

7 /s/ Daniel R. Watkins  
8 Daniel R. Watkins  
9 Brian S. Letofsky  
10 8215 South Eastern Avenue  
11 Suite 265  
12 Las Vegas, NV 89123  
13

14 *Attorneys for Plaintiff Mohammed Ali Sekkat*  
15

16 OGLETREE, DEAKINS, NASH, SMOAK  
17 & STEWART, P.C.  
18

19 /s/ Anthony L. Martin  
20 Anthony L. Martin  
21 Jill Garcia  
22 Brian L. Bradford  
23 3800 Howard Hughes Parkway  
24 Suite 1500  
25 Las Vegas, NV 89169  
26

27 *Attorneys for Defendants Eldorado Resorts*  
28 *Corporation and Michael Marrs*

1 **ORDER**  
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3 IT IS SO ORDERED.  
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5   
6 UNITED STATES MAGISTRATE JUDGE  
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8 December 28, 2016  
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10 DATED  
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